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June 22, 2023

**VIA CM-ECF &  
FACSIMILE**

Hon. Nelson S. Román  
United States District Judge  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150  
[Facsimile: (914) 390-4179]

**RE: *Palisades Estates EOM, LLC, et al. v. County of Rockland, New York, et al.*  
United States District Court, Southern District of New York  
Case No.: 7:23-cv-04215-NSR**

Dear Judge Román:

As this Court is aware, our office represents defendant, Niagara County, New York (“Niagara County”), relative to the above-referenced matter. On June 13, 2023, we requested a pre-motion conference on behalf of Niagara County, indicating Niagara County intends to move to dismiss plaintiffs’ Amended Complaint pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. [Docket No. 136]. On June 14, 2023, this Court issued a Memo Endorsement directing plaintiffs to respond to our letter on or before June 22, 2023. [Docket No. 145]. On June 16, 2023, this Court issued a Text Order resetting the deadlines for numerous defendants to answer the Amended Complaint, including Niagara County, to July 17, 2023.

On June 19, 2023, counsel for plaintiffs wrote to this Court requesting permission to file a single opposition of no more than five pages to all letters seeking a pre-motion conference concerning a motion to dismiss. In this same letter, counsel for plaintiffs also requested an extension to file their opposition up to and including, July 20, 2023. [Docket No. 181]. On June 20, 2023, this Court issued a Memo Endorsement granting plaintiffs’ request for an extension and permitting plaintiffs to file a single opposition of no more than five pages to all letters seeking a pre-motion conference. [Docket No. 185]. While Niagara County does not object to the plaintiffs’ request for additional time to respond to the letters for a pre-motion conference, Niagara County requests that this Court likewise extend Niagara County’s time to answer or otherwise respond to the Amended Complaint including by motion to dismiss until at least 30 days after the Court conducts the pre-motion conference.

Hon. Nelson S. Román  
United States District Judge  
June 22, 2023  
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Thank you for the Court's attention to this matter.

Respectfully submitted,

*s/Brian P. Crosby*

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cc: All counsel of record [via CM-ECF]